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8 UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 vs.

13 JUSTIN LEE TRIPP,

14 Defendant.

2:19-MJ-00394-NJK

Stipulation For a Protective Order

15 The parties, by and through the undersigned, respectfully request that the Court issue an
16 Order protecting from disclosure to the public, or any third party not directly related to this
17 case, any documents, recordings, or other tangible things produced by the government during
18 discovery, containing personal identifying information of victims and their financial
19 information. The parties state as follows:

- 20 1. The complaint, (ECF No. 1), issued in May of 2019.
- 21 2. Tripp had his initial appearance and was detained on January 30, 2020, at which
22 time Assistant Federal Public Defender Kathryn Newman's continued representation of Mr.
23 Tripp was confirmed.
- 24 3. A preliminary hearing has been set for February 14, 2020.

1 4. Discovery in this matter has been produced to the Federal Public Defender's
2 office.

3 5. The complaint arises out of Tripp's and his co-conspirator's 2016 conspiracy to
4 steal victims' identities and use those identities to commit vehicle-financing fraud, that is,
5 fraudulently purloining high-end vehicles from car dealerships and then selling them to
6 unwitting buyers. The co-conspirators' crimes occurred as they moved through Washington,
7 Oregon, California, and finally to Nevada, where Tripp was arrested by Las Vegas
8 Metropolitan Police Department officers (LVMPD) on or about March 21, 2016. At the time
9 of his arrest, Tripp possessed identity document making implements that were forensically
10 examined and found to contain numerous victim PII, as well as templates used to make
11 counterfeit documents. Tripp also possessed approximately Washington state driver's licenses
12 bearing his photo and stolen identities' names and dates of birth, and approximately counterfeit
13 access devices in stolen identities' names. As a result of the conspiracy, there is more than 1300
14 bates stamped items, and a number of forensic exams of electronic devices seized from the co-
15 conspirators. The discovery includes, but is not limited to, victims' PII and their financial
16 information, ("Protected Information"). The release of such information to the public or third
17 parties not involved in the case could endanger the privacy of thousands of individuals and also
18 subject them to potential misuse of their identities. The "Protected Information" is subject to
19 this protective order.

20 6. In order to protect the privacy of the victims and witnesses, the parties intend to
21 restrict access to the following individuals: attorneys for all parties, and any personnel that the
22 attorneys for all parties consider necessary to assist in performing those attorneys' duties in the
23 prosecution or defense of this case, including investigators, paralegals, retained experts, support
24 staff, and any other individuals specifically authorized by the Court (collectively, the "Covered

1 Individuals”).

2 7. The Covered Individuals shall be advised of the Protective Order, and as such
3 without leave of Court, the Covered Individuals shall not:

- 4 a. make copies for, or allow copies of any kind to be made by any other
5 person of the “Protected Information” in this case;
- 6 b. allow any other person to read, listen, or otherwise review the
7 “Protected Information” in this case;
- 8 c. use the “Protected Information” for any other purpose other than preparing
9 to defend against or prosecute the charges in the indictment or any further
10 superseding indictment arising out of this case; or
- 11 d. attach any “Protected Information” to any of the pleadings, briefs, or other
12 court filings except to the extent those pleadings, briefs, or filings are filed
13 under seal or properly compliant with LR IC 6-1.

14 8. The defendant shall only be permitted to review the Protected Information in the
15 presence of defense counsel who shall retain exclusive possession of the Protected Information.
16 Defense counsel will ensure that any discovery item left with Defendant is fully redacted of any
17 Protected Information.

18 9. Nothing in this stipulation is intended to restrict the parties’ use or introduction
19 of the “Protected Information” as evidence at trial or support in motion practice.

20 10. The parties shall inform any person to whom disclosure may be made pursuant
21 to this order of the existence and terms of this Court’s order.

22 11. The parties reserve the right to seek to modify the terms of this protective order at
23 a later time pursuant to Federal Rule of Criminal Procedure 16(d)(1). Should a reasonable need
24 for this protective order cease to exist, on grounds other than a Covered Individual or some
other person violating or circumventing its terms, the government will move expeditiously for
its dissolution.

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10. The defense hereby stipulates to this protective order.

Respectfully submitted,
For the United States:

NICHOLAS A. TRUTANICH
United States Attorney

/s/ Kimberly M. Frayn
KIMBERLY M. FRAYN
Assistant United States Attorney

For the Defendants:

/s/ Kathryn Newman
KATHRYN NEWMAN
Assistant Federal Public Defender
Attorney for Justin Lee Tripp

IT IS SO ORDERED:



THE HONORABLE NANCY J. KOPPE
United States Magistrate Judge

February 4, 2020

Date